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Attorneys for Plaintiffs
GARY CONTRERAS &
ROSEMARY CONTRERAS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE: PORTFOLIO RECOVERY
ASSOCIATES, LLC TELEPHONE
CONSUMER PROTECTION ACT
LITIGATION

GARY CONTRERAS & ROSEMARY
CONTRERAS, husband and wife,

Plaintiffs,

v.

PORTFOLIO RECOVERY ASSOCIATES,
LLC, a Delaware Limited Liability Company,

Defendant.

) Case No. 3:11-md-02295-JAH-(BGS)

)

) Hon. John A. Houston

) Hon. Bernard G. Skomal

)

) THIS DOCUMENT RELATES TO:

) Case No. 3:15-cv-00104-JSC

) (Contreras)

)

) **JOINT MOTION TO DISMISS FOURTH**

) **CAUSE OF ACTION FOR VIOLATION**

) **OF TELEPHONE CONSUMER**

) **PROTECTION ACT AND FOR**

) **ISSUANCE OF A SUGGESTION FOR**

) **REMAND TO THE JUDICIAL PANEL**

) **ON MULTIDISTRICT LITIGATION TO**

) **REMAND THE CASE TO THE U.S.**

) **DISTRICT COURT, NORTHERN**

) **DISTRICT OF CALIFORNIA;**

) **PROPOSED ORDER**

1 The parties to the above-entitled action, pursuant to FRCP 41(a)(1)(A)(ii), hereby
2 stipulate to dismiss the Fourth Cause of Action for Violation of Telephone Consumer Protection
3 Act. with prejudice.

4 The parties further request that this Court issue a suggestion to the Judicial Panel on
5 Multidistrict litigation (hereinafter "MDL Panel") to remand this case to the United States
6 District Court, Northern District of California. Since the Telephone Consumer Protection Act is
7 being dismissed, this case will no longer benefit from further coordinated proceedings.

8 DATED: February 5, 2016

DELTA LAW GROUP

9 /s/ Jim G. Price

10 BY: _____

JIM G. PRICE

11 Attorneys for Plaintiffs

12 GARY CONTRERAS & ROSEMARY
CONTRERAS

13 email: deltalawgroup@yahoo.com

14 DATED: February 5, 2016

PRA GROUP

15 OFFICE OF GENERAL COUNSEL

16 /s/ Nathan A. Searles

17 BY: _____

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